

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE CELGENE
CORPORATION SECURITIES
LITIGATION

Case No. 2:18-cv-04772 (JMV) (JBC)

**NOTICE OF UNOPPOSED
MOTION TO SEAL PORTIONS
OF LEAD PLAINTIFF'S
MEMORANDUM OF LAW IN
OPPOSITION TO
DEFENDANTS' APPEAL FROM
THE MAGISTRATE JUDGE'S
FEBRUARY 24, 2022 LETTER
ORDER PURSUANT TO LOCAL
CIVIL RULE 5.3**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that on April 11th, 2022, or as soon thereafter as counsel may be heard, the undersigned, Plaintiff AMF Pensionsförsäkring AB ("AMF" or "Plaintiff") shall move before the United States District Court, District of New Jersey, Martin Luther King Courthouse, 50 Walnut Street, Newark, NJ 07101, for an Order pursuant to L. Civ. R. 5.3 sealing the portions of Lead Plaintiff's Memorandum of Law in Opposition to Defendants' Appeal from the Magistrate Judge's February 24, 2022 Letter Order Granting Lead Plaintiff Leave to File a Third Amended Complaint (ECF No. 190) identified in the Index annexed hereto as Exhibit 1, and granting such further relief as the Court may deem appropriate.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, which addresses documents designated as Confidential pursuant to the Stipulated Discovery

Confidential Order entered in this case on April 2, 2020, ECF No. 86, Plaintiff will rely on the accompanying Declaration of James E. Cecchi dated April 11th, 2022.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 5.3(c)(1), no brief is necessary in support of the motion, as the parties do not believe a brief would assist the Court.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

Dated: April 11, 2022

Respectfully Submitted,

/s/James E. Cecchi

James E. Cecchi

Donald A. Ecklund

**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY &
AGNELLO, P.C.**

5 Becker Farm Road

Roseland, NJ 07068

Telephone: (973) 994-1700

Facsimile: (973) 994-1744

jcecchi@carellabyrne.com

decklund@carellabyrne.com

Christopher A. Seeger

SEEGER WEISS, LLP

55 Challenger Road

6th Floor

Ridgefield Park, NJ 07660

Telephone: (973) 639-9100

*Co-Liaison Counsel for Lead Plaintiff
and Proposed Co-Liaison Counsel for
the Class*

Andrew L. Zivitz
Matthew L. Mustokoff
Joshua E. D'Ancona
Margaret E. Mazzeo
Nathan A. Hasiuk
**KESSLER TOPAZ
MELTZER & CHECK, LLP**
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056
azivitz@ktmc.com
mmustokoff@ktmc.com
jdancona@ktmc.com
mmazzeo@ktmc.com
nhasiuk@ktmc.com

*Lead Counsel for Lead Plaintiff
and Proposed Class Counsel*

Salvatore J. Graziano
Adam H. Wierzbowski
Adam D. Hollander
Robert F. Kravetz
Benjamin W. Horowitz
**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1448
salvatore@blbglaw.com
adam@blbglaw.com
adam.hollander@blbglaw.com
robert.kravetz@blbglaw.com
will.horowitz@blbg.com

Additional Counsel for the Class

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing to be electronically filed the with the CM/ECF system. Those attorneys who are registered with the Electronic Filing System will receive notice of this filing by ECF and email. I further certify that a courtesy copy of this filing will be served upon the Court.

Dated: April 11, 2022

**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO,
P.C.**

/s/James E. Cecchi
James E. Cecchi